Southeast District Office

2195 Front Street Logan, OH 43138 TELE: (740) 385-8501 FAX: (740) 385-6490

Bob Taft, Governor Jennette Bradley, Lieutenant Governor Christopher Jones, Director

March 4, 2004

Re:

Coshocton County

Clow Water Systems Company

Facility ID # 0616010006

PTI # 06-07432

EU ID # P901, K006, F007, F016,

F015, K002 and F014

Patrick Huth Clow Water Systems Company P.O. Box 6001 2266 South Sixth Street Coshocton, OH 43812-6001

Dear Mr . Huth:

This office has performed a preliminary review of the above referenced permit-to-install (PTI) application received on February 12, 2004, and I have been assigned to process your application. The purpose of this review is to identify basic deficiencies early in the permit process, and allow you to make corrections. The attached checklists detail the additional information or corrections needed. A checklist is provided for each form you submitted which needs additional information or corrections. The data you submit must be in the form of either (1) a complete resubmittal of your application, or (2) submittal of only the missing or incorrect data, depending upon the box checked below:

- Your application is being returned to you as incomplete; you will need to reapply by resubmitting a corrected application. Signatures must be original, not copies.
- The requested data can be submitted without resubmission of the entire application. Only the pages with missing or incomplete information need to be resubmitted. Please submit the requested information to this office within seven (7) days from the receipt of this letter, otherwise, your application can not be processed and will be returned to you as incomplete.

Note that OAC rule 3745-31-02 prohibits the construction, installation or modification of any air contaminant source (emissions unit) without first obtaining a final permit to install.

If you have any questions concerning this letter or your application, please contact me at (740) 380-5216 or email zach.hamlin@epa.state.oh.us.

Sincerely,

Zachary Hamlin

Environmental Specialist 2

Division of Air Pollution Control

Southeast District Office

ZH:sb

CC:

Angle Hardesty, DO/SEDO

APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM) EPA FORM 3150b

Preliminary Completeness Check

	PTI number assigned <u>06-07432</u> OEPA Emissions Unit ID (if established) <u>P901</u> Source Description <u>Cupola furnace for molten iron production</u>		
	Dobernption	- Supota farmace for money from production	
DO/LA	AA staff pers	son completing this form Zach Hamlin Date March 2, 2004	
	COMPLE	TE (check this box when everything below is found complete)	
Item Num	Check	Description of Information Needed	
25		If a modification to an emissions unit, OEPA Emission Unit ID was missing (otherwise, to be completed by DO/LAA).	
26		Company ID for Emissions Unit was missing.	
27		Emissions Unit Activity description was missing.	
28		Equipment description was missing.	
29		The Construction/Modification/Emissions Testing Schedule was either missing or incomplete. Specifically,	
30		The Emissions Information table for criteria pollutants was either not filled out or was missing some data (check box as the DO/LAA deems necessary). Specifically,	

Item		
Num	Check	Description of Information Needed
31	X	The Proposed Operating Schedule was either not filled out or was missing some data. Specifically, the maximum hours of operation is listed as follows 20 hours/day 7,300 hours per year. Please be aware that these hours of operation will be included as a operational restriction in the PTI for this emission unit.
	V.,	
32	X	The Add-on Control Equipment information was either not filled out or was missing some data. Specifically, The supplemental control device # 1 information - combustion chamber residence time (seconds) needs to be listed
33		The Process or Activity Flow Diagram(s) was not attached.
34		The Emissions egress point(s) information was either not filled out or was missing some data. Specifically,
35		It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance.
36		It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08.
37		The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically,
38		The appropriate Emission Activity Category form(s) was either missing or incomplete.
Other		Below is a description of other additional information required at this time.

IRON AND STEEL FOUNDRIES: FUGITIVE DUST EMISSIONS EPA FORM 3123

Preliminary Completeness Checklist

PTI nu	ımber assign	ed <u>06-07432</u> OEPA Emissions Unit ID (if established) <u>P901</u>
Source	e Description	Cupola furnace for molten iron production
DO/L	AA staff per	son completing this form Zach Hamlin Date March 2, 2004
	COMPLE	TE (check this box when everything below is found complete)
Item		
Num	Check	Description of Information Needed
1 - 2		Ohio EPA ID and/or company ID for emissions unit was missing.
3		The type(s) of processes included in the emissions unit were not checked.
4 - 5	X	The emission control methods section was not filled out or missing some data. Specifically, the following sections need to be completed 4.B.3.b.& c and 4.B.4.

APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM) EPA FORM 3150b

Preliminary Completeness Check

	_	Annealing Oven
DO/L	AA staff pers	son completing this form Zach Hamlin Date March 2, 2004
	COMPLE	ΓΕ (check this box when everything below is found complete)
Item Num	Check	Description of Information Needed
25		If a modification to an emissions unit, OEPA Emission Unit ID was missing (otherwise, to be completed by DO/LAA).
26		Company ID for Emissions Unit was missing.
27		Emissions Unit Activity description was missing.
28		Equipment description was missing.
29	X	The Construction/Modification/Emissions Testing Schedule was either missing or incomplete. Specifically, the initial startup date needs to be provided.
30		The Emissions Information table for criteria pollutants was either not filled out or was missing some data (check box as the DO/LAA deems necessary). Specifically,
	, ,	
Item Num	Check	Description of Information Needed

Permit to Install Emissions Unit Information Form 31 The Proposed Operating Schedule was either not filled out or was missing some data. Specifically, ___ 32 The Add-on Control Equipment information was either not filled out or was missing some data. Specifically, 33 The Process or Activity Flow Diagram(s) was not attached. 34 The Emissions egress point(s) information was either not filled out or was missing some data. Specifically, 35 It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance. 36 It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08. 37 The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically, 38 The appropriate Emission Activity Category form(s) was either missing or incomplete. Other Below is a description of other additional information required at this time.

FUEL BURNING EQUIPMENT EPA FORM 3101

Preliminary Completeness Checklist

PTI nu	ımber assign	led 06-07432 OEPA Emissions Unit ID (if established) <u>P020</u>
Source	Description	Annealing Oven
DO/LA	AA staff pers	son completing this form Zach Hamlin Date March 2, 2004
X	COMPLE	TE (check this box when everything below is found complete)
Item Num	Check	Description of Information Needed
1		The fuel burning equipment input and or output capacity was either missing or incomplete. The rated, maximum and normal heat input in million British Thermal Units (BTU) or output in pounds of steam per hour (lbs-steam/hr) is required. This data can usually be obtained from manufacturer of the equipment or from the metal plate attached to the equipment.
2		The percent used for either space heat, process or power was missing.
3		The type of fuel burned in this equipment was not checked and/or described.
4		The type of draft associated with this equipment was not checked.
5		The type of combustion monitoring for this equipment was not checked and/or described.
6		The type of firing for coal fired units was not checked and/or described. If you do not know the type of firing you should contact the manufacturer of the fuel burning equipment.
7		The fly ash reinjection (yes/no) was not checked.

Fuel Burning Equipment

Item Num	Check	Description of Information Needed
8		The type of oil or fuel burned in this equipment was not checked and/or described.
9		The type of fuel atomization employed was not checked and/or described.
10		Whether an oil heater is employed was not circled. if so, the temperature was not given.
11		The fuel data table was either not filled out or was missing some data. The heat content of the fuel (BTU/unit), the % of either ash or sulfur, the quality of fuel used per year, the normal and maximum amount of fuel used per hour are all required for each fuel. For coal and oil the percent of sulfur is required. For coal, oil, and wood the percent ash is required. If you do not know these values you should contact your fuel supplier for the information.
Other		Below is a description of other additional information required at this time.

APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM) EPA FORM 3150b

Preliminary Completeness Check

		Pipe feeder, traversing car with revolvers, 3 outside spray guns, 3 inside
		supply pump and associated equipment.
		on completing this form Zach Hamlin Date March 2, 2004
	COMPLE	ΓΕ (check this box when everything below is found complete)
Item Num	Check	Description of Information Needed
25		If a modification to an emissions unit, OEPA Emission Unit ID was missing (otherwise, to be completed by DO/LAA).
26		Company ID for Emissions Unit was missing.
27		Emissions Unit Activity description was missing.
28		Equipment description was missing.
29		The Construction/Modification/Emissions Testing Schedule was either missing or incomplete. Specifically,
30	X	The Emissions Information table for criteria pollutants was either not filled out or was missing some data (check box as the DO/LAA deems necessary). Specifically, the only pollutants reported is PM and PM10. Is this correct?

Item Num	Check	Description of Information Needed
31	. 🗆	The Proposed Operating Schedule was either not filled out or was missing some data. Specifically,
32		The Add-on Control Equipment information was either not filled out or was missing some data. Specifically,
33		The Process or Activity Flow Diagram(s) was not attached.
34		The Emissions egress point(s) information was either not filled out or was missing some data. Specifically,
	·	
35		It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance.
36		It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08.
37		The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically,
38	. 🛄	The appropriate Emission Activity Category form(s) was either missing or incomplete.
Other		Below is a description of other additional information required at this time.

COATING OR PRINTING OPERATIONS

EPA FORM 3103/3108

Preliminary Completeness Checklist

PTI nu	ımber assi	igned 06-07432 OEPA Emissions Unit ID (if established) K006
Source	e Descript	ion Pipe feeder, traversing car with revolvers, 3 outside spray guns, 3 inside paint
		oply pump and associated equipment.
DO/L	AA staff p	person completing this form Zach Hamlin Date March 2, 2004
	COMPI	LETE (check this box when everything below is found complete)
Item Num	Check	Description of Information Needed
1		Description and type of material being coated or printed on was not included.
2		Description of all equipment included in the proposed coating or printing operation was not included.
3	T.	The data table concerning any ovens associated with coating/printing operation was either not filled out or was missing data. Specifically,
4	X	The information table concerning any booth or enclosures associated with coating/printing operation was either not filled out or missing some data. Specifically, is the installation date of Jan/2003 for the Carolina Virginia paint booth correct.
5		The method(s) of coating or ink application and other associated information was not checked and/or specified.
6		Average/maximum/total maximum number or parts, materials or products being coated or printed was missing.

Coating or Printing Operations

Item		
Num	Check	Description of Information Needed
7		It was not indicated (yes/no) if the coating/printing operation will comply with any volatile organic compound (VOC) emission rate or content requirement by use of a daily or monthly volume-weighted average VOC emissions rate or coating content.
8	X	Coating/ink data was either missing or incomplete. Specifically, is the only coating used Rayco 5900?
		The table for solvent composition was either not filled out or missing some data. Specifically,
9		Usage data table was either not filled out missing some data. Specifically,
		Cleanup material/purge material recovery data was either missing or incomplete. Specifically,
Other	X	Below is a description of other additional information required at this time. 1.) If the Carolina Virginia paint booth was installed in Jan/2003. Did Clow obtain a PTI prior to installation? 2.) Several places in the application VOC emissions from K006 are included for facility wide emission calculations. Since the only coating listed (Rayco 5900) has a VOC content of 0 lbs./gal would you please explain?

APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM) EPA FORM 3150b

Preliminary Completeness Check

Source Description Shakeout (Vibrating Table) Source Description Shakeout (Vibrating Table)			
DO/LA	AA staff per	son completing this form Zach Hamlin Date March 3, 200)4
	COMPLE	TE (check this box when everything below is found complete)	
Item Num 25	Check	Description of Information Needed If a modification to an emissions unit, OEPA Emission Unit ID was missin (otherwise, to be completed by DO/LAA).	ng
26	₂ 🗖	Company ID for Emissions Unit was missing.	
27		Emissions Unit Activity description was missing.	
28		Equipment description was missing.	
29	X	The Construction/Modification/Emissions Testing Schedule was either missing or incomplete. Specifically, the initial installation date needs to b included.	e
30		The Emissions Information table for criteria pollutants was either not fille out or was missing some data (check box as the DO/LAA deems necessar Specifically,	

Permit to Install Emissions Unit Information Form

Item Num 31	Check X	Description of Information Needed The Proposed Operating Schedule was either not filled out or was missing some data. Specifically, the maximum hours of operation is listed as follows 20 hours/day 7,300 hours per year. Please be aware that these hours of operation will be included as a operational restriction in the PTI for this emission unit.
32	X	The Add-on Control Equipment information was either not filled out or was missing some data. Specifically, is 250.F3 the correct company ID for this baghouse?
33		The Process or Activity Flow Diagram(s) was not attached.
34		The Emissions egress point(s) information was either not filled out or was missing some data. Specifically,
35		It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance.
36		It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08.
37		The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically,
38		The appropriate Emission Activity Category form(s) was either missing or incomplete.
Other		Below is a description of other additional information required at this time.

IRON AND STEEL FOUNDRIES: FUGITIVE DUST EMISSIONS EPA FORM 3123

Preliminary Completeness Checklist

	_	ed <u>07-07432</u> OEPA Emissions Unit ID (if established) <u>F007</u> Jolt Shakeout (vibrating table)
DO/LA	AA staff pers	son completing this form Zach Hamlin Date March 3, 2004
Z	COMPLE	TE (check this box when everything below is found complete)
Item Num 1 - 2	Check	Description of Information Needed Ohio EPA ID and/or company ID for emissions unit was missing.
3		The type(s) of processes included in the emissions unit were not checked.
4 - 5		The emission control methods section was not filled out or missing some data. Specifically,
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	1ron and Steel Foundries: Fugitive Dust Emissions		
Item Num Other	Check	Description of Information Needed Below is a description of other additional information required at this time.	
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APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM) EPA FORM 3150b

Preliminary Completeness Check

Source Description BMM Shakeout				
DO/LAA staff person completing this form Zach Hamlin Date March 3, 2004				
	COMPLE	TE (check this box when	everything below is fou	nd complete)
Item Num 25	Check	Description of Inform If a modification to an element of the complete	emissions unit, OEPA E	mission Unit ID was missing
26		Company ID for Emiss	ions Unit was missing.	
27		Emissions Unit Activity	y description was missin	g.
28		Equipment description	was missing.	
29	X		ification/Emissions Test Specifically, the initial	ing Schedule was either installation date needs to be
30				llutants was either not filled DO/LAA deems necessary).
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Permit to Install Emissions Unit Information Form

Item Num 31	Check X	Description of Information Needed The Proposed Operating Schedule was either not filled out or was missing some data. Specifically, the maximum hours of operation is listed as follows 20 hours/day 7,300 hours per year. Please be aware that these hours of operation will be included as a operational restriction in the PTI for this emission unit.
32	X	The Add-on Control Equipment information was either not filled out or was missing some data. Specifically, is 250.F4 the correct company ID for this baghouse?
33		The Process or Activity Flow Diagram(s) was not attached.
34		The Emissions egress point(s) information was either not filled out or was missing some data. Specifically,
35	. 🔲	It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance.
36		It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08.
37		The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically,
38		The appropriate Emission Activity Category form(s) was either missing or incomplete.
Other		Below is a description of other additional information required at this time.

IRON AND STEEL FOUNDRIES: FUGITIVE DUST EMISSIONS EPA FORM 3123

Preliminary Completeness Checklist

PTI number assigned <u>07-07432</u> OEPA Emissions Unit ID (if established) <u>F016</u>					
Source	Source Description BMM Shakeout				
	DO/LAA staff person completing this form Zach Hamlin Date March 3, 2004				
X					
Item Num	Check	Description of Information Needed			
1 - 2		Ohio EPA ID and/or company ID for emissions unit was missing.			
. 3		The type(s) of processes included in the emissions unit were not checked.			
4 - 5		The emission control methods section was not filled out or missing some data. Specifically,			
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1ron and Steel Foundries: Fugitive Dust Emissions		
Item Num Other	Check	Description of Information Needed Below is a description of other additional information required at this time.

APPLICATION FOR PERMIT TO INSTALL (PERMIT TO INSTALL EMISSIONS UNIT INFORMATION FORM)

EPA FORM 3150b

Preliminary Completeness Check

Source	Source Description Paint Spray guns and booth DO/LAA staff person completing this form Zach Hamlin Date March 3, 2004			
X	COMPLE	TE (check this box when everything below is found complete)		
Item Num	Check	Description of Information Needed		
25	LJ .	If a modification to an emissions unit, OEPA Emission Unit ID was missing (otherwise, to be completed by DO/LAA).		
26		Company ID for Emissions Unit was missing.		
27		Emissions Unit Activity description was missing.		
28		Equipment description was missing.		
29		The Construction/Modification/Emissions Testing Schedule was either missing or incomplete. Specifically,		
30	X	The Emissions Information table for criteria pollutants was either not filled out or was missing some data (check box as the DO/LAA deems necessary). Specifically, the only pollutants reported is PM and PM10. Is this correct?		

Permit to Install Emissions Unit Information Form

Item Num	Check	Description of Information Needed
31		The Proposed Operating Schedule was either not filled out or was missing some data. Specifically,
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	• .	
32		The Add-on Control Equipment information was either not filled out or was missing some data. Specifically,
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33		The Process or Activity Flow Diagram(s) was not attached.
34		The Emissions egress point(s) information was either not filled out or was missing some data. Specifically,
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		·
35		It was not specified (yes/no) if the application, per OAC rule 3745-35-07, for federally enforceable limits as part of the per issuance.
	 1	
36	ĻJ	It was not specified (yes/no) if a request for information included in this application for this emissions unit was being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08.
37		The continuous emissions monitoring equipment table was either not filled out or was missing some data. Specifically,
38		The appropriate Emission Activity Category form(s) was either missing or incomplete.
Other		Below is a description of other additional information required at this time.
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COATING OR PRINTING OPERATIONS EPA FORM 3103/3108

Preliminary Completeness Checklist

Listed below are the errors, omissions, or items which need to be corrected or further explained on the form submitted in order for this part of the application to be considered initially complete. The item number corresponds to the same item number found on the form identified above. If the item below is checked, then that part of the application must be corrected and resubmitted.

OFPA Emissions Unit ID (if established) K002

Source	e Descrip	igned <u>06-07432</u> OEPA Emissions Unit ID (if established) <u>K002</u> tion <u>paint spray guns and booth</u> person completing this form <u>Zach Hamlin</u> Date <u>March 3, 2004</u>
		LETE (check this box when everything below is found complete)
Item Num	Check	Description of Information Needed
1		Description and type of material being coated or printed on was not included.
2		Description of all equipment included in the proposed coating or printing operation was not included.
3		The data table concerning any ovens associated with coating/printing operation was either not filled out or was missing data. Specifically,
4		The information table concerning any booth or enclosures associated with coating/printing operation was either not filled out or missing some data. Specifically,
5		The method(s) of coating or ink application and other associated information was not checked and/or specified.
6		Average/maximum/total maximum number or parts, materials or products being coated or printed was missing.

Coating or Printing Operations

Item		
Num	Check	Description of Information Needed
7		It was not indicated (yes/no) if the coating/printing operation will comply with any volatile organic compound (VOC) emission rate or content requirement by use of a daily or monthly volume-weighted average VOC emissions rate or coating content.
8		Coating/ink data was either missing or incomplete. Specifically,
		The table for solvent composition was either not filled out or missing some data. Specifically,
9	. 🗆 .	Usage data table was either not filled out missing some data. Specifically,
		Cleanup material/purge material recovery data was either missing or incomplete. Specifically,
Other		Below is a description of other additional information required at this time.